

ORIGINAL

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
8EHQ-12- 18548	8812000091	2 6 12

COMMENTS:

DOES NOT CONTAIN CBI

341498



Songwon International-Americas, Inc.
211 East Parkwood Avenue
Suite 101
Friendswood, TX 77546
Tel: +1-281-648-1585
Fax: +1-713-456-1812

February 3, 2012

Via Federal Express

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

2012 FEB - 6 AM 10: 04
RECEIVED
OPT CBIC



Courier Deliveries:
1201 Constitution Avenue, NW
Washington, DC 20004-3302

Subject: Notice in Accordance with Section 8 (e): Results of an Acute Eye Irritation Study in Rabbits with dibutyltin oxide (CAS No. 818-08-6)

Dear Sir/Madam:

CONTAINS NO CBI

This letter is to inform you of the results of an acute eye irritation study in the rabbit conducted with the substance dibutyltin oxide (CAS No. 818-08-6).

The substance was subject to an acute eye irritation study in one New Zealand white albino rabbit. The study was conducted according to the principles of good laboratory practice and according to OECD Guideline 405 and EU-method B5, and therefore judged to be of high quality and reliability.

For the purpose of the study 0.1 mL of the pure test material was placed into the conjunctival sac of the right eye of one rabbit. The left eye remained untreated and was used for control purposes. Assessment of ocular damage/irritation was made approximately 1 hour and 24, 48 and 72 hours following treatment, according to the Draize Scale for Scoring Ocular Irritation (1977). Any other ocular effects and clinical signs of toxicity were also noted. Additional observations were made on Days 7 and 14 to assess the reversibility of the ocular effects and individual bodyweights were recorded on Day 0 and Day 14.

A single application of the test material to the non-irrigated eye of one rabbit produced scattered or diffuse corneal opacity (after 48 and 72 hours and after 7 days), iridial inflammation (after 24, 48 and 72 hours and after 7 days) and moderate (after 1, 24 and 48 hours) to severe conjunctival irritation (after 72 hours and 7 and 14 days). Other ocular effects noted were blepharitis (after 72 hours), off white appearance of the nictitating membrane and lower conjunctival membrane (after 7 and 14 days), blood stained discharge (after 14 days) and pannus formation over the whole cornea (after 14 days). Adverse ocular reactions prevented accurate evaluation of the cornea and iris at the 14-Day observation.



CONTAINS NO CBI

Conclusion: The test material was considered to be corrosive to the rabbit eye due to the irreversible ocular damage noted. As the findings observed on day 14 are not likely to be reversible within 21 days, the test material was considered to be an eye irritant Category 1 according to Globally Harmonized System of Classification and Labelling of Chemicals (GHS), fourth revised edition, United Nations, 2011. It should be labelled with the signal word **Danger**, the **Hazard Statement: Causes serious eye damage** and the **Symbol:**



Songwon International understands that reporting of the results from this study under TSCA 8(e) is in accordance with EPA's policy.

If you have any questions, please call James McGinley at 281-648-1585.

Sincerely,

A handwritten signature in black ink, appearing to read "James J. McGinley".

James J. McGinley

President

Songwon International Americas Inc.

UPS Internet Shipping: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.

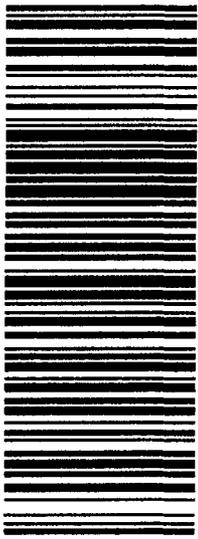
Find your closest UPS location at: www.ups.com/dropoff

Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com.

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

FOLD HERE

<p>ROCHELLE HAMPTON 281-648-1585 SONGWON INTERNATIONAL 211 EAST PARKWOOD FRIENDSWOOD TX 77546</p> <p>SHIP TO: TSCA CONFI BUSI INFO CENTER (7407M) US ENVIRONMENTAL PROTECTION AGENCY 1200 PENNSYLVANIA AVENUE, NW EPA EAST-ROOM 6428 ATTN: SEC 8(E) WASHINGTON DC 20004-2403</p>	<p>0.0 LBS LTR</p> <p>1 OF 1</p>	<p>MD 201 9-80</p> 	<p>UPS NEXT DAY AIR</p> <p>1</p> <p>TRACKING #: IZ 46Y 644 01 9077 9709</p> 	<p>BILLING: P/P</p> <p>Reference# 1: Acute Eye Irritation Study</p> <p>UPS 14 0 25 WNTTB60 24 04 01/2012</p> 
---	--	---	--	--